

ALICE GRIFFITH REDEVELOPMENT PROJECT
Record of Decision and Findings Statement

**City and County of San Francisco
Mayor's Office of Housing in
Cooperation with the Successor
Agency to the San Francisco
Redevelopment Agency**

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CHAPTER 1.0

Description of the Project

1.1 Overview

This document is a Record of Decision (ROD) and Findings Statement for the Alice Griffith Redevelopment Project (Project). The Project is located in the Bayview Hunters Point (BVHP) neighborhood of the City of San Francisco and is generally bounded by Gilman Avenue on the south, Hawes Street on the west, Carroll Avenue on the north, and Arelious Walker Drive on the east, with a rectangular extension to the south along Giants Drive that includes a portion of the Candlestick Park stadium parking area (Project Site). This document has been prepared by the City and County of San Francisco's Mayor's Office of Housing (MOH) in cooperation with the City and County of San Francisco as the Successor Agency to the San Francisco Redevelopment Agency (Successor Agency). MOH has been designated as the Responsible Entity by the U.S. Department of Housing and Urban Development (HUD) for assumption of its authority and lead agency responsibility under the National Environmental Policy Act (NEPA). This ROD and Findings Statement have been prepared pursuant to NEPA (42 USC §4321 et seq.), the Council on Environmental Quality Regulations for implementing NEPA (40 CFR Parts 1500-1508) and HUD regulations for Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities (24 CFR Part 58).

This ROD and Findings Statement draws upon facts and conclusions in the Final Environmental Impact Statement (FEIS) approved by MOH, as the Responsible Entity. This ROD and Findings Statement attests to the fact that MOH has complied with all applicable procedural requirements in reviewing this matter, including, but not limited to:

- Preparation and approval of the Draft Scope for the Environmental Impact Statement for public review and comment;
- Holding of public meetings on the Draft Scope;
- Receiving public comments on the Draft Scope;
- Preparation and approval of the Final Scope for the Environmental Impact Statement;
- Preparation and approval of the Draft Environmental Impact Statement (DEIS) for public comment and review;
- Filing and distribution of the DEIS and notices of completion and availability;

- Receiving public comments on the DEIS within the prescribed period;
- Preparation and approval of the FEIS for review;
- Filing and distribution of the FEIS and notices of completion and availability; and
- Preparation of this Record of Decision and Findings Statement.

This ROD and Findings Statement also attests to the fact that MOH has given due consideration to the Draft Scope, Final Scope, DEIS and FEIS and the public comments submitted on the Proposed Action. This ROD and Findings Statement is the final step in the NEPA process.

1.2 Project Purpose and Need

The Proposed Action is the approval by HUD of funding and development agreements associated with redevelopment of the Project Site. The Project Site currently contains the 256-unit Alice Griffith public housing development and overflow parking areas for Candlestick Park. The Project proposes to replace the existing units with new affordable housing and to construct additional below market and market rate rental units for a total of 1,210 units. The Project also would construct new open space and community-serving uses and upgrade infrastructure, including street grid improvements, to better connect the site to the surrounding neighborhood.

The City has identified the need for redevelopment of the BVHP neighborhood, including the Project Site. The Alice Griffith public housing development is in need of improvements to address physical decay and isolation from the surrounding community. The purpose of the Proposed Action is to address these needs through redevelopment of the Project Site.

The Alice Griffith public housing development is distressed and deteriorated, with residences in various stages of physical decay. In 2007, the San Francisco Housing Authority (SFHA) compiled an Immediate Needs Report to document existing improvement needs at SFHA properties, including Alice Griffith.¹ Identified issues for Alice Griffith include, but are not limited to, the following: dry rot and weather damage to structures, lead paint and asbestos pipe insulation and tiles requiring abatement, broken windows and dilapidated window frames, damaged metal and wood doors, dilapidated wood decks and railings, substandard electrical system with frequent overloads, damaged walls and ceilings, and ineffective hydronic heating systems in need of replacement. Building deficiencies present potential safety and health concerns. Alice Griffith would be more expensive to repair than to rebuild and thus the most feasible financial alternative is the replacement of structures.²

The existing Alice Griffith development is also physically isolated from the surrounding community. The development includes several internally looped roadways; however, there is only

¹ SFRA, *Bayview Hunters Point Redevelopment Plan Amendment, Report on the Plan Amendment*. May 2010. Appendix C.

² HOPE SF, *Frequently Asked Questions*, Available online at: <http://hope-sf.org/faq.php>, accessed November 2011.

one access point to the off-site street network. There are few neighborhood-serving retail and quality recreational uses near the Project Site. These conditions of distress and isolation frustrate community efforts to create a secure and healthy living environment.

1.3 Description of the Proposed Action Alternative

The Proposed Action Alternative includes the redevelopment of a residential neighborhood and associated infrastructure on the Project Site. The Project Site is defined in **Section 1.2** of the FEIS. Properties within the Project Site are owned by SFHA, the State of California through the Department of Parks and Recreation and the State Lands Commission, the Successor Agency to the San Francisco Redevelopment Agency, and the City and County of San Francisco through the Department of Recreation and Parks. The Property would undergo land transfers prior to development as described below.

1.3.1 Land Transfers

Proposed land transfer/development agreements concerning affordable housing parcels require HUD and SFHA approval. Land transfers are proposed between SFHA, the City and County of San Francisco as the Successor to the Redevelopment Agency (Successor Agency), CP Development Co. (the master developer of the Candlestick Point-Hunters Point Shipyard Phase II [CP-HPS] project), McCormack Baron Salazar, Inc. (MBS, CP Development Co.'s joint venture partner for the development of Alice Griffith), and the State of California. These transfer agreements are pursuant to the CP-HPS Disposition and Development Agreement by and between the Successor Agency and CP Development Co. and ancillary, related documents governing the development program at the Project Site.³ Additional details regarding land transfer agreements are included in Section 2.2.1 of the FEIS.

1.3.2 Proposed Development

Proposed Land Uses

The Proposed Action Alternative includes residential, open space and community serving land uses. A land use plan is shown in **Figure 2-1** of the FEIS.

Residential Uses – The Proposed Action Alternative calls for up to 1,210 new dwelling units on the Project Site at densities of 15-75 units per acre for 360 units, and 50-125 units per acre for 850 units. Housing would include one-for-one replacement of the existing 256 public housing units, plus a mix of for-sale and rental units, both market-rate and below market-rate. The new residences would include townhouses, stacked townhouses, and three- to five-story stacked flats. The maximum height for new residential buildings would be 65 feet.

³ Disposition and Development Agreement (Candlestick Point and Phase 2 of the Hunters Point Shipyard) by and between the Redevelopment Agency of the City and County of San Francisco and CP Development Co., LP, dated for reference as June 3, 2010.

Community Serving Uses – Community serving uses may include retail, an early learning child development center, and a community center. Space would be provided on the ground floor of residential buildings for community-serving retail and service facilities.

The existing community center, known as the Opportunity Center, is a modular unit. The Opportunity Center may be relocated or demolished, depending upon construction phasing needs. If the Opportunity Center were demolished, it will be replaced with a new, on-site community center.

Open Space – A new 1.4-acre park, Alice Griffith Neighborhood Park, would extend for several blocks near the center of the neighborhood. The park would include community gardens, sports facilities, picnic areas and other recreational amenities.

Infrastructure

Water Supply

The Project Site would be served by the City's low pressure water system from the University Mound Reservoir. Reclaimed water mains would be developed for irrigation of park and landscape areas. Reclaimed water mains would be connected to the potable water system initially, until a source of reclaimed water is developed by the City. A connection to the City's Auxiliary Water Supply System would also be developed for fire protection purposes only.

Wastewater

The Proposed Action Alternative would include a separated sanitary sewer system, which would convey wastewater by gravity flow to the Arelious Walker Drive combined sewer, which flows to the Southeast Water Pollution Control Plant.

Drainage

The storm drainage system would handle stormwater by three methods; the particular method employed for any individual storm would depend on the magnitude of the event. These methods include treated storm flows, a five-year storm⁴ piped system, and overland flow. The storm drainage system would be separated from the sanitary sewer system to reduce wet weather flows to the Southeast Water Pollution Control Plant. On-site treatment would handle most of the stormwater generated by typical precipitation. Examples of on-site treatment are vegetated swales, flow-through planter boxes, permeable pavement, green rooftops, and rainwater cisterns. Treatment for the street rights-of-ways and other public, would be handled within the rights-of-way of streets in the Project Site. Examples of these stormwater treatment facilities are vegetated buffer strips, flow-through planter boxes, bioretention facilities, pervious surfaces, and subsurface detention vaults. Bioretention basins would also be constructed in parks and open space. Larger rainfall events, up to a five year storm, would be conveyed through the new stormwater pipe network out of the bay. Stormwater from storms larger than a five year event may be routed to the bay by

⁴ The maximum level of storm activity expected to occur on average every five years; similar definition for 1.17-year and 100-year storms.

overland flow along a network of street gutters and roadways. The overland flow stormwater system would fully contain a 100-year storm.

Joint Trenches

A joint trench network would be developed at the Project Site and would include electrical, communications, and gas utilities. Major and minor joint trenches would be routed through the street network to provide power, communications, and gas infrastructure to the Project Site.

Transportation Improvements

The existing street grid network in the Bayview neighborhood would be extended through the Project Site. This grid extension would provide a substantial increase in the number of roadway connections and better integrate the Project Site with the neighborhood. The street grid would continue east into the Candlestick Point development. The result is that the Project Site would be linked to the surrounding area via a continuous street grid network. Streets would be completed through the Alice Griffith neighborhood, which is consistent with the San Francisco Better Streets Plan,⁵ to enable safe access for all users. Proposed street design would include driveway access management, traffic calming features, such as signs and striping, pedestrian bulbs where feasible at intersections, and refuge islands. Streetscape amenities, including benches, lighting, plantings and other features, would facilitate a high-quality pedestrian and bicycle network, consistent with the Better Streets Plan. A Transportation Demand Management Plan would be adopted to promote transit use and access to nearby existing and proposed transit lines.

Construction

The Proposed Action Alternative would be constructed over a ten-year construction period beginning in 2013 and ending in 2023. Redevelopment of the Project Site would proceed in phases so that it would not displace existing residents. The initial phases would develop currently vacant portions of the site, and existing residents would then occupy those new units before structures were demolished and redeveloped in later phases.

During construction, the following types of activities would be expected: abatement and demolition, site preparation and earthwork/grading, building construction and controlled rock fragmentation. Some activities could occur simultaneously. Demolition and construction activities would be limited to weekdays and daytime hours (7:00 AM to 7:00 PM).

Abatement and Demolition

Demolition would include removing buildings and infrastructure. As necessary, lead-based paint, asbestos, polychlorinated biphenyls (PCBs), and mercury would be abated in buildings before demolition. Infrastructure would be demolished to allow the construction of new infrastructure.

⁵ City and County of San Francisco. *Better Streets Plan*. Adopted by the City and County of San Francisco on December 6, 2010.

Minor utilities would be abandoned in place or would be removed if they interfered with the installation of new infrastructure.

Site Preparation and Earthwork/Grading

The Proposed Action Alternative would include major site preparation and earthwork. All soil is assumed to be retained on-site and used for project grading and improvements. Site earthwork and grading would typically be performed using standard construction equipment, such as excavators, loaders, tractors, compactors, crushers, graders, and water trucks.

Building Construction

Building construction would include developing new residential and community service buildings, planting new landscaping, and constructing roadways, sidewalks, and utilities (although these activities would not occur simultaneously). The number of truck trips on any given day would vary, from a low of four trips to a maximum of 152 trips during site preparation.

Controlled Rock Fragmentation

The Project Site is underlain by Franciscan sandstone and shale. Most of the immediate Project Site vicinity consists of thin fill over bedrock and artificial fill underlain by young bay mud over bedrock. Bedrock is at elevations ranging from 45 feet above City datum to 10 feet below. Bedrock would need to be removed in the northern portion of the Project Site to depths ranging from 2 to 23 feet below ground surface and may include localized well-cemented beds. An estimated 140,000 cubic yards of rock would need to be cut. At least 70 percent of this rock would be removed by heavy equipment and the remaining 30 percent (approximately 42,000 cubic yards) would be removed by controlled rock fragmentation. Heavy construction equipment rock removal methods could include ripping using a Caterpillar D9 tractor with ripper attachment, and mechanical rock breaking, using hammer, splitters, or cutters. Harder areas of bedrock may require alternative techniques for removal, such as controlled rock fragmentation. Controlled rock fragmentation technologies include pulse plasma rock fragmentation, controlled foam or hydraulic injection, and controlled blasting. In some scenarios, using a combination of these techniques may be necessary. Controlled blasting can typically be performed at noise levels below typical building demolition levels (80 to 100 decibels).

Current estimates indicate that there are approximately 42,000 cubic yards of hard rock in three areas of the Project Site.⁶ For estimation, each area is assumed to contain a third of this volume, or 14,000 cubic yards of rock, that may need to be removed using controlled rock fragmentation. Excavators could remove 14,000 cubic yards of rock in six weeks in three events, each producing approximately 4,500 cubic yards, with a two-week period between events for set up and excavation. The three events would occur sequentially, and would take approximately 17 weeks.

⁶ San Francisco Redevelopment Agency and City and County of San Francisco Planning Department, Candlestick Point-Hunters Point Shipyard Phase II Development Plan Project Final Environmental Impact Report May 2010, pg. II-78.

Development Standards

Design for Development

New construction would be regulated by development controls and design guidelines within the Candlestick Point Design for Development (D4D) document, which is included in **Appendix B** of the FEIS. The D4D sets forth specific development standards and guidelines, including but not limited to site coverage, building height and bulk, setbacks, building modulation and frontage, open space, parking and loading. The D4D also addresses street layout, open space and blocks, and establishes overarching strategies for placement of certain uses and building types relative to street and open space types.

Green Building Concepts

The Proposed Action Alternative contains a number of features that would implement policies articulated in the San Francisco Sustainability Plan,⁷ including high performance glazing, energy-efficient lighting, daylighting, shading, building envelope optimization, reflective roofs, and natural ventilation in the project design. The project sponsor has also committed to constructing buildings at the Project Site to the Leadership in Energy and Environmental Design (LEED) for Neighborhood Development Gold standard, based on the pilot version of the rating system released in June 2007. Following the 2007 LEED Neighborhood Development Pilot Program rating system, the Proposed Action Alternative would incorporate strategies, including the following:

- Enhanced habitat values;
- Proximity to transit and bicycle routes;
- Urban design that promotes walking and discourages driving;
- Affordable housing that supports a community of mixed ages and income;
- Community participation in community planning and design;
- Compliance with the San Francisco Green Building Ordinance;
- ENERGY STAR compliance to be documented by a Home Energy Rating System;
- Unbundled parking;
- Drought-tolerant plant species and efficient irrigation systems, such as drip irrigation, moisture sensors, and weather data-based controllers;
- Tree-lined streets throughout the development;
- Access to public space and recreational amenities through the creation of parks and playfields;

⁷ City and County of San Francisco. *Sustainability Plan for San Francisco*. San Francisco Department of the Environment. October 1996.

- Efficient use of water and the potential use of recycled water for non-potable uses such, as irrigation, and vehicle washing; and
- Progressive management to detain, retain, and/or treat stormwater on-site or in adjacent areas.

Furthermore, the Proposed Action Alternative would comply with all applicable provisions of San Francisco's Green Building Ordinance, which is contained in Chapter 13C of the San Francisco Building Code. Recycling, composting, and trash facilities would be provided, as required by the San Francisco Environment Code. The Proposed Action Alternative has set an energy efficiency performance target of 15 percent below the energy efficiency standards articulated in Title 24, Part 6 of the 2008 California Code of Regulations.

1.4 Project History and Public Participation

1.4.1 Background

The redevelopment of Alice Griffith is part of the HOPE SF program: a public-private partnering effort to revitalize the City's most distressed public housing sites. In March 2007, the HOPE SF Task Force recommended that the City and the SFHA partner to rebuild distressed public housing sites in San Francisco, including the Alice Griffith neighborhood, as mixed-income communities. The recommendations of the HOPE SF Task Force form a critical part of the policy framework for the Proposed Action Alternative. The president of the Alice Griffith Tenants Association (AGTA) served as part of the HOPE SF Task Force, ensuring that the needs of Alice Griffith residents were represented. The first AGTA meeting held to discuss Alice Griffith's revitalization was on March 29, 2007, and resident meetings – including the participation of staff from MOH, the Office of Economic and Workforce Development (OEWD), the San Francisco Redevelopment Agency (SFRA), and SFHA, and the development team – have continued regularly since then, with repeated discussion on the topics of supportive service activities, job development, relocation and reoccupancy, and site design. Translation services in Samoan, Spanish, and Mandarin are provided on an as-needed basis. Since 2010, AGTA meetings have been facilitated by Urban Strategies, the project sponsor's social services provider. Working on-site, Urban Strategies has focused on individualized needs of Alice Griffith residents, including: 1) assisting residents locate job training and job placement opportunities; 2) analyzing household needs and making services connections for families; and 3) conducting liaison work with San Francisco Unified School District. Urban Strategies' social services have also focused on preparatory work for the construction program and tenancy in the new development, including: 1) building the capacity of AGTA members to lead and engage other residents in the HOPE SF process; 2) increasing access to clear, culturally accessible, and relevant information; and 3) creating forums that support open and meaningful dialogue between residents and the development team, with encouragement of resident self-advocacy.

City staff and the development team have also held numerous meetings with the larger community, neighbors and stakeholders since 2007 to discuss Alice Griffith's revitalization. These meetings

were often held pursuant to the authority of the BVHP Project Area Committee, a diverse body of community members elected to lead the Bayview on development, economic, and social issues.

Redevelopment of the Project Site is included within the CP-HPS Project approved by the San Francisco Board of Supervisors on August 3, 2010. Prior to approval, the CP-HPS Project was reviewed and discussed in more than 230 public meetings, including meetings with the Redevelopment Agency Commission, the Board of Supervisors, the Planning Commission and other City commissions, along with other local forums.

1.4.3 NEPA Process

HUD published a Notice of Intent (NOI) in the Federal Register on December 8, 2010, to inform agencies and the general public that a DEIS would be prepared for the Proposed Action. The NOI also solicited comments concerning the DEIS. A public scoping meeting to gather input from residents and stakeholders for the preparation of the DEIS was held on January 5, 2011, at the Bret Harte Elementary School at 1035 Gilman Avenue, next to the Project Site. A notice of the scoping meeting was sent on December 5, 2010, to all current residents of Alice Griffith public housing, as well as all neighbors within 300 feet of the site. In addition, the notice was sent to news publications and interested parties and organizations. Approximately 15 people attended the meeting and shared comments, ideas, and concerns regarding the Proposed Action. Contact information for MOH, OEWD, SFRA, SFHA, and CP Development Co. staff was provided for follow up and to establish lines of communication to ensure that comments, ideas, and concerns were being addressed throughout the planning and development process. A scoping report summarizing the scoping process was prepared and included within **Appendix A** of the DEIS and FEIS.

The scoping comments were considered in the DEIS, which was completed in December 2011. The Notice of Availability (NOA) of the DEIS for the Alice Griffith Redevelopment Project was distributed to federal, state, and local agencies and other interested parties, including Alice Griffith residents and neighbors within 300 feet of the site. The NOA was published in the San Francisco Examiner on December 16, 2011 with a comment and review period ending on February 1, 2012. The EPA published the DEIS availability in the Federal Register on December 30, 2011. A notice was published in the San Francisco Examiner on January 22, 2012 extending the comment period to March 13, 2012. Notification of the filing of the DEIS with EPA and extension of the comment period was also published in the Federal Register on December 30, 2011 and February 3, 2012 respectively. Overall the review and comment period included approximately 88 days. The DEIS was made available to the public throughout the comment period and following the comment period at MOH's Office and on the MOH Notices website page.⁸ Seven letters were received by MOH during the DEIS comment period

This FEIS was completed in September 2012 and included responses to substantive comments and a discussion of any revisions made to the EIS in **Appendix H** of the FEIS. The NOA of the

⁸ Mayor's Office of Housing, 2011. Public Notices. Available online at: sf-moh.org/index.aspx?page=155.

FEIS was distributed to federal, state, and local agencies and other interested parties, including Alice Griffith residents and neighbors within 300 feet of the site. The EPA published the FEIS availability in the Federal Register on September 21, 2012, noting the comment period ending on October 22, 2012, which satisfies a 30-day review period. The NOA was published in the San Francisco Examiner on September 17, 2012. The FEIS was made available to the public throughout the comment period and following the comment period at MOH's Office and on the MOH Notices website page.⁹ No comment letters were received by MOH during the FEIS comment period.

This ROD and Findings Statement has been issued following a 30-day waiting period, beginning with the publication of the FEIS availability in the Federal Register on September 21, 2012.

⁹ Ibid.

CHAPTER 2.0

Alternatives Considered

The Proposed Action addresses the need for redevelopment of Alice Griffith public housing. Several alternatives to the Proposed Action were considered. The Housing Replacement Alternative, Reduced Development Alternative and No Action Alternative were fully analyzed in the DEIS and FEIS, and are described below. The two development alternatives were analyzed to compare the environmental impacts of reduced-intensity development.

An alternative to move existing Alice Griffith residents, temporarily or permanently to Hunters Point Hill was considered but not carried forward for detailed analysis because it would not meet the purpose and need as discussed in **Section 2.7** of the FEIS.

2.1 Housing Replacement Alternative

The Housing Replacement Alternative includes the development of a residential neighborhood and associated infrastructure on the Project Site. As with the Proposed Action, this alternative would include the transfer of land to the SFHA and developer in order to facilitate redevelopment of the Project Site. In comparison to the Proposed Action, this alternative would develop less residential units and no community-serving retail.

A land use plan for this alternative is shown in **Figure 2-2** of the FEIS. The Housing Replacement Alternative would replace the 256-existing public housing units on a one-to-one basis, with no mixed-income housing. The Opportunity Center may be relocated or demolished, depending upon construction phasing needs. If the Opportunity Center were demolished, it will be replaced with a new, on-site community center. A new 1.4-acre park would extend for several blocks near the center of the neighborhood, as discussed under the Proposed Action.

The infrastructure and transportation improvements would be similar to those discussed for the Proposed Action. Construction would proceed in phases so that it would not displace existing residents. The Housing Replacement Alternative would be constructed to the D4D standards and would incorporate the green building concepts discussed for the Proposed Action.

2.2 Reduced Development Alternative

The Reduced Development Alternative includes the development of a residential neighborhood and associated infrastructure on the Project Site. As with the Proposed Action, this alternative would include the transfer of land to the SFHA and developer in order to facilitate redevelopment of the

Project Site. In comparison to the Proposed Action, this alternative would develop fewer residential units.

A land use plan for this alternative is shown in **Figure 2-3** of the FEIS. The Reduced Development Alternative would include up to 875 new residential units, including 315 units at a density of 15-75 units per acre and 560 units at a density of 50-125 units per acre. The Opportunity Center may be relocated or demolished, depending upon construction phasing needs. If the Opportunity Center were demolished, it will be replaced with a new, on-site community center. Space would be provided on the ground floor of residential buildings for community-serving retail and service facilities. A new 1.4-acre park would extend for several blocks near the center of the neighborhood, as discussed under the Proposed Action.

The infrastructure and transportation improvements would be similar to those discussed for the Proposed Action. Construction would proceed in phases so that it would not displace existing residents. The Reduced Development Alternative would be constructed to the D4D standards and would incorporate the green building concepts discussed for the Proposed Action.

2.3 No Action Alternative

Under the No Action Alternative, conditions at the Project Site would remain unchanged. The 256 existing public housing units would not be replaced, and no other improvements would be implemented.

CHAPTER 3.0

Environmental Impacts and Mitigation

The environmental analysis considered the following impact categories: Air Quality; Hazards and Hazardous Materials; Land Use and Land Use Planning; Noise; Socioeconomics (including Growth Inducement); Environmental Justice; Public Services and Utilities; Visual Character/Aesthetics; Hydrology, Flooding and Water Quality; Traffic and Transportation; Geology and Soils; Cultural and Historic Resources; Biological Resources; and Cumulative Impacts.

Based on the analysis in the FEIS, the following impact categories would not have significant, adverse impacts and thus did not warrant mitigation: Land Use and Land Use Planning; Socioeconomics, Environmental Justice, Public Services and Utilities, Cultural and Historic Resources. Supporting analysis is provided in the FEIS and thus these issues are not discussed further in this chapter.

Based on the analysis in the FEIS, the following impact categories would have impacts that can be fully mitigated by the implementation of mitigation measures: Air Quality; Hazards and Hazardous Materials; Noise; Visual Character/Aesthetics; Hydrology, Flooding and Water Quality; Geology and Soils; and Biological Resources. The Proposed Action would also contribute considerably to a cumulatively significant and adverse Traffic and Transportation impact, for which there is no feasible mitigation to reduce the level of significance. Below is a brief description of the significant and adverse impacts within these impact categories and associated mitigation measures.

3.1 Air Quality

FEIS Impact 2.5: Exposure to Health Risks. Emissions from all phases of project construction (demolition, grading, excavation, foundation work, and building construction) were estimated, using an air dispersion modeling system. The construction health risk assessment determined that the lifetime cancer risk (assuming a 70-year lifetime) for the maximally exposed individual on the Project Site would be 20 in a million, which exceeds the local Bay Area Air Quality Management District (BAAQMD) threshold of 10 in a million. This is considered a significant and adverse impact.

Mitigation

FEIS Mitigation Measure 2.5 includes that construction equipment used in the Alice Griffith parcels meets the USEPA Tier 4 engine standards for particulate matter control (or

equivalent) throughout the duration of construction activities. The effects of implementation of this mitigation were modeled and would reduce the lifetime cancer risk below the BAAQMD threshold and thus to a less-than-significant level.

3.2 Hazards and Hazardous Materials

FEIS Impact 3.1: Exposure to Hazardous Fill Material. The Proposed Action would involve site excavation, and grading and compacting soils. Due to the unknown source of fill underlying the Project Site, these activities could expose unknown contaminated soil and fill materials to the environment. Potential contaminants include petroleum, oil, metals, and chemicals that may have leached into the soil from nearby sites or may have been included in the original fill materials. This poses a potential health risk for construction workers, residents occupying the Project Site and people in the surrounding area. This impact is considered significant and adverse.

Mitigation

FEIS Mitigation Measure 3.1a includes characterization of fill materials and development of site mitigation plans if site investigations indicate the presence of hazardous materials, including soil vapor intrusion.

FEIS Mitigation Measure 3.1b includes preparation of a contingency plan to address the procedures for discovery of currently unknown contaminants. These include notification to surrounding properties and site control procedures. Site control procedures would include investigation and if applicable remediation options (off-site removal and disposal, containment, or treatment.)

FEIS Mitigation Measure 3.1c includes preparation of a site-specific Health and Safety Plan (HASP) in compliance with applicable federal and state Occupational Safety and Health Administration (OSHA) requirements. The HASP shall include identification of chemicals of concern, potential hazards, a requirement for personal protective equipment and devices, and emergency response procedures.

Through implementation of Mitigation Measures 3.1a-c, the site will be adequately characterized prior to construction activities, plans will identify precautionary measures during construction and plans will identify control procedures if unknown contaminants are identified during construction. These measures would reduce potential impacts to a less-than-significant level.

FEIS Impact 3.2: Proximity to a Potentially Hazardous Site. The Bayview Plume Study Area located potentially upgradient of the Project Site is undergoing a remediation process to address volatile organic contamination in groundwater. Due in large part to the fact that neither the full lateral extent of the contamination plume nor the groundwater flow direction has been defined, the possibility remains that contamination of the underlying groundwater could be present beneath the Project Site. The potential intrusion of soil vapors either from the Bayview Plume Study Area or from past releases in the site soils presents a potentially significant and adverse impact.

Mitigation

Mitigation Measure 3.1a includes soil vapor sampling and, if necessary, removal of contaminated soils or installation of vapor barriers beneath proposed structures. Potential for soil vapors would also be addressed in the contingency plan and site-specific HASP identified in Mitigation Measures 3.1b and 3.1c. Through implementation of this Mitigation Measures 3.1a-c, the site will be adequately characterized prior to construction activities, plans will identify precautionary measures during construction, and plans will identify control procedures if unknown contaminants are identified during construction. These measures would reduce potential impacts from soil vapors to a less than significant level.

FEIS Impact 3.3: Release of Hazardous Substances. Buildings within the Project Site potentially contain asbestos, lead based paint (LBP) and polychlorinated biphenyls (PCBs). It is also possible that some of the fill material on site was cut from nearby bedrock with naturally-occurring-asbestos (NOA). These materials could be released during construction posing potentially significant and adverse health risks to construction workers, residents on the Project Site and people in the surrounding area.

Mitigation

The project sponsor would implement Mitigation Measure 3.1c (discussed above), preparation of a site-specific HASP. The HASP would identify chemicals of concern, potential hazards, a requirement for personal protective equipment and devices, and emergency response procedures.

Additionally, the project sponsor would implement Mitigation Measure 3.3 which includes coordination with BAAQMD prior to demolition and abatement work. Under Mitigation Measure 3.3b, the project sponsor would be required to determine if soil on the site contains NOA, and if so, prior to construction, the project sponsor would obtain approval of an Asbestos Dust Mitigation Plan from BAAQMD and would ensure that specific dust control measures are implemented during construction. The project sponsor would also implement Mitigation Measure 3.3c, which requires adherence to notification requirements and demolition/abatement work performance standards in order to minimize public and worker exposure to LBP. With these measures impacts would be reduced to a less-than-significant level.

3.3 Noise

FEIS Impact 5.2: Local Standards for Construction Noise. Construction noise would be required to comply with the limitations established by the San Francisco Noise Ordinance (80 dBA at 100 feet for non-impact equipment). Some construction activities have the potential to exceed the local daytime noise standard. Therefore, this temporary impact would be significant and adverse.

Mitigation

FEIS Mitigation Measure 5.2 includes noise control measures and designation of a noise disturbance coordinator for responding to noise complaints. These measures would reduce the temporary increases in noise levels experienced during construction activities in accordance with the Noise Ordinance, reducing impacts to a less-than-significant level.

3.4 Visual Character/Aesthetics

FEIS Impact 9.1: Character, Scale and Aesthetic Appeal. Construction equipment and materials on the Project Site during construction phases of the Proposed Action would introduce elements that are out of character with the existing environment, which includes residential uses nearby. Therefore, the temporary impact regarding aesthetic appeal during construction is considered significant and adverse.

Mitigation

FEIS Mitigation Measure 9.1 includes measures to: control the staging and cleanliness of construction equipment, screen views of staging areas at street level, and sweep surrounding streets used for construction access. These measures would reduce visual/aesthetic impacts from construction activities to a less-than-significant level.

3.5 Hydrology, Flooding and Water Quality

FEIS Impact 10.1: Depletion or Degradation of Surface Water Quality. Construction of the Proposed Action would include demolishing buildings and infrastructure, movement of fill materials, grading, and site compaction of development areas. These activities would expose soils to precipitation and wind. These activities could lead to degradation of water quality from stormwater coming in contact with contaminated areas, such as parking lots or construction sites. Stormwater could transport contaminants off-site, thereby contaminating other water sources. If dewatering activities are proposed they would also need to be managed to prevent contaminants prior to discharge of contained water. This temporary impact is considered significant and adverse for construction.

Mitigation

Implementation of Mitigation Measure 10.1a, 10.1b and 10.1c include development of Stormwater Pollution Prevention Plans (SWPPPs) and a stormwater control plan for the Project Site. Plans would include best management practices (BMPs) and other measures for stormwater quality protection. Mitigation Measure 10.1d, Groundwater Dewatering Plan, specifies how water would be collected, contained, treated, monitored and eventually discharged. Incorporation of these measures would minimize the potential for stormwater to become contaminated with pollutants from construction and the transportation of contaminants to off-site surface waters, thus reducing impacts to a less-than-significant level.

FEIS Impact 10.2: Depletion or Degradation of Groundwater. Construction and development could result in the accidental release of potentially hazardous materials that could contaminate

surface water resources. This contamination could spread to groundwater through percolation. While groundwater is not utilized as a source of drinking water in the Project Site vicinity, contamination could affect future options for water supply. This impact is considered significant and adverse.

Mitigation

Implementation of Mitigation Measure 10.1a through 10.1d would include BMPs for stormwater and discharge from dewatering activities, which would minimize contaminants from entering groundwater through percolation. These measures would reduce impacts to a less-than-significant level.

3.6 Geology and Soils

FEIS Impact 12.1: Ground Shaking. Ground shaking is likely to occur in the Project Site vicinity as a result of earthquakes on one or more regional faults. The severity at the Project Site would depend on the location and fault involved but there is the potential for ground shaking at a level which could damage buildings and infrastructure, and present risks to people. Due to the potential for severe groundshaking for all of the Project Site, this impact is considered significant and adverse.

Mitigation

Implementation of Mitigation Measure 12.1a and 12.1b would ensure that further site-specific geotechnical investigations are conducted prior to construction, which include seismic analyses. Requirements for structures and other improvements would be identified and incorporated into the project plans to ensure that facilities can withstand peak ground accelerations.

FEIS Impact 12.2: Soil Suitability. Filled lands bayward of the historic shoreline, including portions of the Project Site, are highly susceptible to liquefaction. Some of the materials used for filling lands outside the historic bay shoreline may be susceptible to settlement. Other potential soil concerns include localized areas with expansive clay soils, which could cause damage to roads or foundations, and corrosive soils, which could enhance corrosion of metal pipes or other materials in contact with the soil. These impacts are considered significant and adverse.

Mitigation

FEIS Mitigation Measures 12.2a, 12.2b and 12.2c would ensure that further site-specific geotechnical investigations are conducted prior to construction, which identify soils with undesirable characteristics and identify appropriate corrective measures to reduce liquefaction and other soil hazards. Additionally, site-specific analyses to identify necessary structural and building engineering design techniques would be required.

FEIS Impact 12.3: Destabilization of Geologic Conditions. Grading and site preparation could involve fracturing the Franciscan bedrock that underlies the Project Site. Heavy construction equipment, including hoe-rams, splitters, and cutters, could be used to fragment rock. In addition, harder bedrock may require removal using a technique known as controlled rock fragmentation, which has the potential to result in settlement or lateral movement of existing structures on adjacent or nearby properties. This impact is considered significant and adverse.

Mitigation

Implementation of Mitigation Measure 12.3 would include site specific methods and technologies to reduce vibration, or settlement or lateral movement of nearby structures. Additionally, a monitoring plan would be required to detect ground settlement or lateral movement of structures in the vicinity of an excavation and would include corrective measures for unacceptable ground movement. This would reduce impacts to a less-than-significant level.

FEIS Impact 12.5: Soil Erosion. Soils on the Project Site have a moderate water erosion hazard. During construction, there is increased potential for erosion of exposed soils by wind and water, which could contribute to water quality degradation. This impact is considered significant and adverse.

Mitigation

Mitigation Measures 10.1a, 10.1b and 10.1c includes the development of SWPPPs and a stormwater control plan which contain BMPs to address soil erosion. This would reduce impacts to a less-than-significant level.

3.7 Biological Resources

FEIS Impact 14.1: Substantial Adverse Effect on Special-Status Species and Other Legally-Protected Species. The removal of trees from the Project Site could adversely impact nesting habitat of raptor species or other native bird species if these species are on the site during construction. As a result, the temporary effects of construction could be significant and adverse.

Mitigation

Implementation of FEIS Mitigation Measure 14.1 includes measures for surveying, identifying, and avoiding occupied nests and delaying construction to prevent nest abandonment and providing a buffer zone around occupied nests. This would ensure that disturbance from construction would not result in the loss of individuals or destruction of nests or eggs, which would reduce the effects of project construction and implementation on legally protected avian species to a less-than-significant level.

FEIS Impact 14.3: Substantial Adverse Effect on Locally-Protected Trees. The removal of trees outside of the Department of Public Works jurisdiction is not subject to the Public Works Code. Thus removal of a large number of trees that meet the size definition of significant trees, without replacement of trees, could result in conflicts with policies articulated in the City's Urban Forestry Ordinance. The City's Planning Code Section 143 embodies similar policies by requiring the planting of certain quantities of street trees when constructing new development in certain areas of the City; however, the Planning Code does not automatically apply in redevelopment areas such as the Project Site. As a result, activities within the Project Site could result in significant and adverse impacts to locally-designated significant trees.

Mitigation

Implementation of FEIS Mitigation Measure 14.3 would encourage the preservation of trees that are large enough to meet the size specification of significant trees in the Public Works Code and would require the replacement of large trees that are removed. Further, it would require the planting of street trees consistent with the intent of the Planning Code Section 143. This would reduce impacts to a less-than-significant level.

3.8 Cumulative Impacts

The Proposed Action would contribute a cumulatively considerable amount of traffic to the intersection of Third Street and Carroll Avenue. Since this traffic would add more than five percent of net new trips to an intersection that is already projected to operate at an unacceptable level during cumulative conditions, the impact is considered to be significant and adverse, using the impact criteria from the SF Guidelines. No feasible mitigation is available.

CHAPTER 4.0

Findings and Decision

The San Francisco Mayor's Office of Housing (MOH), as the Responsible Entity, has determined that it will implement the Proposed Action Alternative (Alternative A of the FEIS). The basis for MOH's decision includes its review of the purpose and need, the environmental impacts of the alternatives, the ability of the alternatives to meet the project purpose and need, economic and technical factors, and the public comments received on the DEIS and throughout the planning process (no comments were received on the FEIS).

Summary of the Proposed Action Alternative

The purpose and need, as described in Section 1.2, is focused on the need for redevelopment of Alice Griffith public housing, including replacement of deteriorating public housing at Alice Griffith and increased connectivity to the surrounding neighborhood. The Proposed Action Alternative will meet the purpose and need and revitalize and enhance Alice Griffith by providing one-for-one replacement public housing; ensuring eligible Alice Griffith housing residents have the opportunity to move to the new, upgraded units directly from their existing Alice Griffith housing units without having to relocate to any other area; providing additional mixed-income housing opportunities; providing community-serving retail and service facilities and a new 1.4-acre park with recreational amenities; extending the surrounding street grid system resulting in improved access to the surrounding community for vehicle, pedestrian and bicycle traffic; improving sidewalks and streetscapes; improving utility infrastructure; and improving water and energy efficiency through green building design. The Proposed Action Alternative would also address existing blight and provide for abatement of lead-based paint, asbestos and polychlorinated biphenyls (PCBs).

Redevelopment of Alice Griffith is part of the HOPE SF program which has as its objectives the replacement of public housing with minimal displacement of residents; creation of an economically integrated community; development of a housing ladder incorporating public housing, affordable housing and market rate housing and the provision of economic opportunities for residents. The Proposed Action Alternative would meet these objectives by avoiding displacement of residents through phased construction and developing a mixed-income community with replacement public housing, below-market rate housing and market-rate housing.

The Proposed Action Alternative would have beneficial environmental impacts related to socioeconomics and environmental justice through improved neighborhood access, creation of

employment opportunities and improvement of housing for low-income and minority populations. The Proposed Action Alternative would have little environmental impact due to the incorporation of feasible mitigation measures that would minimize potentially significant and adverse impacts. All environmental impacts from the Proposed Action Alternative, with the exception of cumulative traffic impacts, would be reduced to a less-than-significant level through adherence to adopted laws and regulations and compliance with the mitigation measures specified in the FEIS. All mitigation measures within the FEIS are considered feasible and will be adopted and implemented. A mitigation and monitoring enforcement program, included in Appendix A to this ROD, sets out the mitigation measures that will be adopted and implemented, identifies who will implement and monitor mitigation measures and contains the schedule for implementation and monitoring of mitigation measures.

The Proposed Action Alternative would contribute a cumulatively considerable amount of traffic to the intersection of Third Street and Carroll Avenue. This intersection would operate at an unacceptable level without the Proposed Action Alternative; however, the Proposed Action would add more than five percent of net new trips to the intersection which is considered to be a significant and adverse impact. In order to improve this intersection to operate at acceptable levels, Third Street would need to be widened to the east and west to accommodate additional rights-of-way needed for additional lanes. This would require demolishing structures, acquiring additional right-of-way, reducing corner sidewalk widths and/or prohibiting on-street parking along Third Street. Widening Third Street or reducing the corner sidewalk space at this location would be inconsistent with the pedestrian environment created by the Third Street Light Rail Project. Widening Third Street would make the pedestrian crossing longer and would require more dedicated pedestrian crossing time as part of the signal phasing plan. For these reasons, roadway widening is considered infeasible. MOH considers this cumulative impact to be outweighed in light of the overall social, economic and other benefits as set out in this ROD of choosing to implement the Proposed Action Alternative.

Environmentally Preferable Alternative and Alternatives Comparison

The San Francisco Redevelopment Agency (now City and County of San Francisco as the Successor Agency), the San Francisco Housing Authority, the City of San Francisco, and CP Development Co. (Applicant) considered a number of development scenarios. The agencies determined 1,210 residential units would best satisfy the purposes and needs of the parties involved and create a suitable variety of economically integrated unit types. However, the development of 1,210 residential units would result in a significant and adverse cumulative traffic impact. Using transportation modeling, the number of below market-rate and market-rate housing units was reduced to a level that avoids significant and unavoidable cumulative traffic impacts and analyzed as the Reduced Intensity Alternative.

The Reduced Intensity Alternative (Alternative C) is the environmentally preferable alternative as all environmental impacts analyzed in the FEIS would be reduced to a level below significance with feasible mitigation measures. This alternative was not considered to provide a notable

environmental benefit in comparison to the Proposed Action Alternative as the intersection of Third Street and Carroll Avenue would continue to operate at unacceptable levels even under the Reduced Intensity Alternative and there is no feasible mitigation to improve operations at this intersection. Environmental impacts in other issue areas would be substantially similar to the Proposed Action Alternative as they involve a similar scale and type of development on the same site.

The No Action Alternative (Alternative D) would result in no impact in many environmental issue areas, including no impacts associated with construction activities. However the No Action Alternative would not achieve the purpose and need, or HOPE SF objectives. As Alice Griffith contains low-income and minority populations and the existing housing would continue to deteriorate (presenting potential safety and health issues), the No Action Alternative would result in significant and adverse impacts with respect to environmental justice issues. The No Action Alternative is also inconsistent with the objectives of local land use plans, which is a significant and adverse impact with no feasible mitigation.

The Housing Replacement Alternative (Alternative B) would result in similar environmental impacts to the Reduced Intensity Alternative. This alternative would not meet the HOPE SF objective of redevelopment of Alice Griffith with a mixed-income community. This alternative would develop substantially fewer residential units, would not create a high density residential neighborhood with a variety of housing types and would not include opportunities for neighborhood retail uses. This is fundamentally inconsistent with the objectives of local land use plans and thus would be a significant and adverse impact with no feasible mitigation.

Conclusion

MOH approves the Proposed Action Alternative as defined in this ROD and Findings Statement. In accordance with 40 CFR §1505.2, MOH has adopted all practical means to avoid or minimize environmental harm associated with the implementation of the Proposed Action Alternative and adopts a monitoring and enforcement program (Appendix A) for mitigation. MOH will ensure the effective implementation and enforcement of all mitigation measures and permit conditions. The MMP will provide for monitoring of construction activities as necessary, on-site identification and resolution of environmental problems, and proper reporting to enforcement agencies. It is intended to be used by the City and County of San Francisco, participating agencies, project contractors, and any mitigation monitoring personnel during implementation of the Proposed Action Alternative. Mitigation measures will also be enforced by requiring compliance with the mitigation measures as a condition of MOH and SFHA approval of land transfers/development agreements between the land owners and site developers.

MOH finds that, on balance, the Proposed Action Alternative would best realize the underlying purpose and need as set forth in Section 1.2 and the overall goals and objectives of HOPE SF, as well as the specific requirements for affordable housing objectives for the CP/HPS project in consideration of economic and technical factors. The Proposed Action Alternative is both financially feasible and best addresses the specific requirements that are included in the

governing documents and overarching vision for the neighborhood and the Alice Griffith Site. The No Action Alternative would not meet the purpose and need and the Housing Replacement Alternative would not meet HOPE SF objectives. The Proposed Action Alternative would best meet the HOPE SF objective of creating an economically integrated community in comparison to the Reduced Intensity Alternative, as the Proposed Action Alternative would provide more below-market rate and market-rate housing within the Alice Griffith community.

There would be a significant and adverse cumulative impact for traffic for which there is no feasible mitigation or alternative which would result in acceptable levels of service at the affected intersection. MOH considers this cumulative impact to be outweighed in light of the overall social, economic and other benefits of choosing to implement the Proposed Action Alternative.

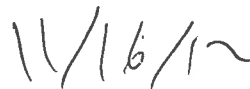
Having considered the DEIS and FEIS, and having considered the above written facts and conclusions relied upon to meet the requirements of the National Environmental Policy Act of 1970, as amended (42 U.S.C. 4371 et seq.), MOH certifies that: consistent with social, economic and other essential considerations from among the reasonable alternatives available, the Proposed Action avoids or minimizes adverse environmental impacts to the maximum extent practicable by incorporating as conditions to the decision those mitigation measures that were identified in the as practicable.

Based on the foregoing determinations and findings and the entire environmental review record, MOH hereby approves the Proposed Action Alternative in accordance with the above-referenced applicable statutory and regulatory requirements in order to facilitate redevelopment of Alice Griffith.

The above ROD and Findings Statement was approved and adopted by MOH on the following date:



Brian Cheu
Director of Community Development
San Francisco Mayor's Office of Housing



Date

APPENDIX A

Mitigation Monitoring and Enforcement Program

This Mitigation Monitoring and Enforcement Program (MMP) provides the framework for mitigating and monitoring prior to and during construction activities, on-site identification and resolution of environmental problems, and proper reporting to the City and County of San Francisco. MOH will ensure the effective implementation and enforcement of all mitigation measures and permit conditions. The MMP will provide for monitoring of construction activities as necessary, on-site identification and resolution of environmental problems, and proper reporting to enforcement agencies. It is intended to be used by the City and County of San Francisco, participating agencies, project contractors, and any mitigation monitoring personnel during implementation of the project. MOH and SFHA will assure that site developers comply with the mitigation monitoring and enforcement program by incorporating the requirement to comply with the Mitigation Monitoring and Enforcement Program as a condition of their approval of land transfers/ development agreements between property owners and site developers.

The MMP is summarized in Table 1 which has the following columns:

1. **Mitigation Measures** – Lists the mitigation measures along with its number as identified in the Final EIS. It has been noted where mitigation measures are the same or similar to measures adopted by the City for the Candlestick Point-Hunters Point Shipyard Phase II Project.
2. **Timeframe for Implementation** – Identifies at what point in time, review process, or phase the mitigation measure will be completed.
3. **Party Responsible for Implementation** – Identifies the entity with primary responsibility for implementing the mitigation.
4. **Party Responsible for Monitoring and Enforcement**– Identifies the entity responsible for monitoring the implementation and enforcement of the mitigation measures.

**TABLE 1
MITIGATION MONITORING AND ENFORCEMENT SUMMARY**

Mitigation Measures	Timeframe for Implementation	Party Responsible for Implementation	Party Responsible for Monitoring and Enforcement
Air Quality			
Mitigation Measure 2.5: Implement Accelerated Emission Control Device Installation on Construction Equipment Used for Alice Griffith Parcels	Prior to issuance of construction site permit	Project Applicant	City and County of San Francisco, Mayor's Office of Housing (MOH); San Francisco Department of Building Inspection (DBI)
The project sponsor will require that construction equipment used in the Alice Griffith parcels would utilize equipment which meets the USEPA Tier 4 engine standards for particulate matter control (or equivalent) throughout the entire duration of construction activities on those parcels.			
Hazards and Hazardous Materials			
Mitigation Measure 3.1a: Article 22A Site Mitigation Plans	Prior to obtaining a site, building or other permit from the City for development activities involving subsurface disturbance of artificial fill materials, the Project Applicant shall characterize the fill materials in accordance with the requirements of San Francisco Health Code Article 22A. In addition to the requirements of Article 22A, site sampling shall include analysis of soil vapor samples to identify potential vapor intrusion of volatile organic compounds. If the site investigation indicates the presence of a hazardous materials release, a site mitigation plan must be prepared. The site mitigation plan must specify the actions that will be implemented to mitigate the significant environmental or health and safety risks caused or likely to be caused by the presence of the identified release of hazardous materials including soil vapor intrusion. The site mitigation plan shall identify, as appropriate, such measures as excavation, containment, or treatment of the hazardous materials, monitoring and follow-up testing, and procedures for safe handling and transportation of the excavated materials, or for protecting the integrity of the cover or for addressing emissions from remedial activities, including the use of vapor barriers into building design plans, consistent with the requirements set forth in Article 22A.	Project Applicant	City and County of San Francisco, MOH; San Francisco Department of Public Health (DPH)
Prior to obtaining a site, building or other permit from the City for development activities involving subsurface disturbance of artificial fill materials, the Project Applicant shall characterize the fill materials in accordance with the requirements of San Francisco Health Code Article 22A. In addition to the requirements of Article 22A, site sampling shall include analysis of soil vapor samples to identify potential vapor intrusion of volatile organic compounds. If the site investigation indicates the presence of a hazardous materials release, a site mitigation plan must be prepared. The site mitigation plan must specify the actions that will be implemented to mitigate the significant environmental or health and safety risks caused or likely to be caused by the presence of the identified release of hazardous materials including soil vapor intrusion. The site mitigation plan shall identify, as appropriate, such measures as excavation, containment, or treatment of the hazardous materials, monitoring and follow-up testing, and procedures for safe handling and transportation of the excavated materials, or for protecting the integrity of the cover or for addressing emissions from remedial activities, including the use of vapor barriers into building design plans, consistent with the requirements set forth in Article 22A.			
In project areas not ordinarily subject to Article 22A requirements, prior to obtaining a site, building or other permit from the City for development activities involving subsurface disturbance of soil, the Project Applicant shall sample the soil in a manner equivalent to the sampling required for fill areas under Article 22A, and the sampling shall include analysis of soil vapor samples to identify potential vapor intrusion of volatile organic compounds. The Project Applicant shall submit the site investigation to the SFDPH for approval in a manner equivalent to the process outlined in Article 22A. If the site investigation indicates the presence of a hazardous materials release, including a potential vapor intrusion hazard, a site mitigation plan must be prepared. The site mitigation plan shall identify appropriate measures, as described above, and it must meet standards equivalent to those required under Article 22A, including the requirement that a qualified professional certify that any mitigation required will be effective.			
Mitigation Measure 3.1b: Unknown Contaminant Contingency Plan	Prior to obtaining the first site, building or other permit for development activities involving subsurface disturbance	Project Applicant	City and County of San Francisco, MOH; San Francisco DPH
Before obtaining the permit for the first site or building or other permit for development involving subsurface disturbance, the project sponsor shall prepare and the SFDPH shall approve a contingency plan to address unknown contaminants encountered during development. This plan, the conditions of which shall be incorporated into the first permit and any applicable permit thereafter, shall establish and describe procedures for implementing a contingency plan, including appropriate notification to nearby property owners, schools and residents and appropriate site control procedures, in the event of unanticipated			

**TABLE 1 (continued)
MITIGATION MONITORING AND ENFORCEMENT SUMMARY**

Mitigation Measures	Timeframe for Implementation	Party Responsible for Implementation	Party Responsible for Monitoring and Enforcement
Hazards and Hazardous Materials (continued)			
<p>Mitigation Measure 3.1b: Unknown Contaminant Contingency Plan (continued)</p> <p>subsurface hazards or hazardous material releases during construction. Control procedures would include further investigation and, if necessary, remediation of such hazards or releases, including off-site removal and disposal, containment, or treatment.</p> <p>In the event unanticipated subsurface hazards or hazardous material releases are discovered during construction, the requirements of this unknown contaminant contingency plan shall be followed. The plan shall be amended, as necessary, if new information becomes available that could affect the implementation of the plan.</p>			
<p>Mitigation Measure 3.1c: Site-Specific Health and Safety Plans</p> <p>Before obtaining the permit for the first site or building or other permit for the project from the City for development involving subsurface disturbance, the project sponsor shall prepare and submit to the SFDPH a site-specific HASP in compliance with applicable federal and state OSHA requirements and other applicable laws to minimize impacts on public health and the environment. Implementation of the HASP shall be required as a condition of any applicable permit. The plan shall include identification of chemicals of concern, potential hazards, a requirement for personal protective equipment and devices, and emergency response procedures. The HASP shall be amended, as necessary, in the event new information becomes available that could affect the implementation of the plan.</p>	<p>Prior to obtaining the first site, building or other permit for the Project from the City for development activities involving subsurface disturbance</p>	<p>Project Applicant</p>	<p>City and County of San Francisco, MOH; San Francisco DPH</p>
<p>Mitigation Measure 3.3: Asbestos Identification and Abatement Mitigation</p> <p>The BAAQMD shall be notified ten days in advance of any proposed demolition or abatement work. Notification includes the names and addresses of operations and persons responsible; description and location of the structure to be demolished/altered including size, age and prior use, and the approximate amount of friable asbestos; scheduled starting and completion dates of demolition or abatement; nature of planned work and methods to be employed; procedures to be employed to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. All asbestos survey and abatement work shall be conducted by a state certified contractor.</p> <p>The local office of the State Occupational Safety and Health Administration (OSHA) shall be notified of asbestos abatement to be carried out. Asbestos abatement contractors shall follow state regulations contained in 8CCR1529 and 8CCR341.6 through 341.14 where there is asbestos-related work involving 100 square feet or more of asbestos containing material. Asbestos removal contractors shall be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur shall have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material shall file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it.</p>	<p>Prior to any demolition or abatement activities</p>	<p>Project Applicant</p>	<p>City and County of San Francisco, MOH; BAAQMD, State OSHA</p>

**TABLE 1 (continued)
MITIGATION MONITORING AND ENFORCEMENT SUMMARY**

Mitigation Measures	Timeframe for Implementation	Party Responsible for Implementation	Party Responsible for Monitoring and Enforcement
Hazards and Hazardous Materials (continued)			
Mitigation Measure 3.3b: Asbestos Dust Mitigation Plan			
<p>Prior to any grading or construction, the project sponsor shall collect soil samples and analyze the potential for NOA to occur in the soil at the Project Site. The number and quality of samples shall accord with the standards and practices generally employed and accepted by environmental consultants and geologists practicing in the field. If the results indicate that NOA is present in the soil on-site, the project sponsor shall prepare and submit to BAAQMD for approval an ADMP for the site, in accordance with the state Asbestos ATCM.</p> <p>The ADMP shall specify dust mitigation practices which are sufficient to ensure that no visible dust crosses the property line, and must include all elements required by 17 CCR § 93105(e), and any other elements required by BAAQMD. Such mitigation practices and elements shall include, without limitation: track-out prevention and control measures, such as removal of visible track-out and use of wheel wash systems or tire shakers; wetting or coverage of storage piles; control of inactive surface areas or storage piles with measures such as wetting, surface crusting, chemical dust suppressants, vegetative cover, and use of wind barriers; on-site traffic control measures, including vehicle speed limits of 15 miles per hour or less and the use of such techniques as watering, chemical dust suppressants, and gravel covers; and earthmoving control measures, such as application of water and suspension of grading during periods of high wind.</p>	Prior to any grading or construction	Project Applicant	City and County of San Francisco, MOH; BAAQMD
Mitigation Measure 3.3c: Lead Based Paint			
<p>Prior to any proposed demolition or abatement work, the project sponsor shall provide the San Francisco Department of Building Inspection (DBI) Director with notice of the location of the project; the scope of work, including the methods and tools to be used; the anticipated job start and completion dates; name, address, and telephone number of the person who will perform the work; and any other information applicable under Chapter 34 of the San Francisco Building Code. No demolition or abatement work shall proceed unless the project sponsor continuously meets the following performance standards: access to the work area by third parties shall be restricted; work debris shall be contained within the work area; and migration of work debris shall be prevented, using such measures as secure protective covering and prevention of dust tracking. Upon completion of the work, the project sponsor shall make all efforts to remove all visible work debris from the work area. In the course of carrying out the work, the project sponsor shall comply with all other applicable requirements of Chapter 34 of the San Francisco Building Code relating to work with Lead Based Paint.</p>	Prior to any demolition or abatement activities	Project Applicant	City and County of San Francisco, MOH; San Francisco DBI
Noise			
Mitigation Measure 5.2: Construction Document Mitigation to Reduce Noise Levels During Construction			
<p>The Project Applicant shall incorporate the following practices into the construction documents to be implemented by the Project contractor:</p> <ul style="list-style-type: none"> • Provide enclosures and mufflers for stationary equipment, shrouding or shielding for impact tools, and barriers around particularly noisy operations on the site 	Prior to issuance of construction site permit	Project Applicant	City and County of San Francisco, MOH; San Francisco DBI, San Francisco Department of Public Works (DPW)

**TABLE 1 (continued)
MITIGATION MONITORING AND ENFORCEMENT SUMMARY**

Mitigation Measures	Timeframe for Implementation	Party Responsible for Implementation	Party Responsible for Monitoring and Enforcement
Noise (continued)			
Mitigation Measure 5.2: Construction Document Mitigation to Reduce Noise Levels During Construction (continued)			
<ul style="list-style-type: none"> • Use construction equipment with lower noise emission ratings whenever possible, particularly air compressors • Provide sound-control devices on equipment no less effective than those provided by the manufacturer • Locate stationary equipment, material stockpiles, and vehicle staging areas as far as practicable from sensitive receptors • Prohibit unnecessary idling of internal combustion engines • Require applicable construction-related vehicles and equipment to use designated truck routes to access the Project site • Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, noise barriers or noise blankets. The placement of such attenuation measures will be reviewed and approved by the Director of Public Works prior to issuance of development permit for construction activities. 	Prior to and during construction	Project Applicant	City and County of San Francisco, MOH; San Francisco DBI
Visual Character/Aesthetics			
Mitigation Measure 9.1: Construction Period Screening and Cleaning			
<p>Construction documents shall require all contractors to strictly control the staging and cleanliness of construction equipment stored or driven beyond the limits of the work area. Construction equipment shall be parked and staged on the Project Site, and staging areas shall be screened from view at street level. Before building permits are issued, the project sponsor (through the construction contractor(s)) shall submit a construction staging, access, and parking plan to the San Francisco Department of Building Inspection (DBI) for review and approval. Construction workers shall be prohibited from parking their vehicles on the street. Vehicles shall be kept clean and free of mud and dust before leaving the Project Site. Each day, project contractors shall be required to sweep surrounding streets used for construction access and to maintain them free of dirt and debris.</p>	Prior to and during construction	Project Applicant	City and County of San Francisco, MOH; San Francisco DBI

**TABLE 1 (continued)
MITIGATION MONITORING AND ENFORCEMENT SUMMARY**

Mitigation Measures	Timeframe for Implementation	Party Responsible for Implementation	Party Responsible for Monitoring and Enforcement
<p>Hydrology, Flooding and Water Quality</p> <p>Mitigation Measure 10.1a: Stormwater Pollution Prevention Plan: Combined Storm Sewer System</p> <p>In compliance with the Article 4.1 of the San Francisco Public Works Code and the City's Construction Site Water Pollution Prevention Program, the project sponsor shall submit a site-specific stormwater pollution prevention plan (SWPPP) to the SFPUC for approval, before construction begins in areas draining to the combined sewer system. The SFPUC requires implementation of appropriate best management practices (BMPs) in the California Stormwater Quality Association Stormwater BMP Handbook-Construction or the Caltrans Construction Site BMPs Manual. In accordance with SFPUC's requirements, the SWPPP shall include the following:</p> <ul style="list-style-type: none"> • An erosion and sediment control plan, with a site map illustrating the BMPs that will be used to minimize on-site erosion and sediment discharge into the combined sewer system and a narrative description of those BMPs. Appropriate BMPs for the erosion and sediment control plan may include: <ul style="list-style-type: none"> o Scheduling—Develop a schedule that includes sequencing construction activities with the implementation of appropriate BMPs. Perform construction and control practices in accordance with the planned schedule. Schedule work to minimize soil disturbance during the rainy season. Schedule major grading operations for the dry season when practical. Monitor the weather forecast for rainfall and adjust the schedule as appropriate. o Erosion control BMPs—Preserve vegetation where feasible, mulch or hydroseed areas until permanent stabilization is established, and use soil binders, geotextiles and mats, earth dikes and drainage swales, velocity dissipation devices, slope drains, or polyacrylamide to protect soil from erosion; o Wind erosion BMPs—Apply water or other dust palliatives to prevent dust nuisance and overwatering, which can cause erosion. Alternatively, cover small stockpiles or areas that remain inactive for seven or more days; o Sediment control BMPs—Install silt fences, sediment basins, sediment traps, check dams, fiber rolls, sand or gravel bag barriers, straw bale barriers, approved chemical treatment, and storm drain inlet protection to minimize the discharge of sediment; sweep streets to remove sediment; and o Tracking controls—Stabilize the construction site entrance to prevent construction vehicles from tracking sediment onto public roads. Stabilize on-site vehicle transportation routes immediately after grading to prevent erosion and to control dust. Install a wash area to remove sediment from tires and under carriages. • Non-stormwater management BMPs may include water conservation practices, dewatering practices that minimize sediment discharges, and BMPs for paving and grinding; identifying illicit connections and illegal dumping; irrigation and other planned or unplanned discharges of potable water; vehicle and equipment cleaning, fueling, and maintenance; concrete curing and finishing; temporary batch plants; and implementing shoreline improvements and working over water. Discharges from dewatering shall comply with the SFPUC's batch wastewater discharge requirements, which regulate influent concentrations for various constituents. 	<p>Prior to and during construction in any area draining to the combined sewer system</p>	<p>Project Applicant</p>	<p>City and County of San Francisco, MOH; SFPUC</p>

**TABLE 1 (continued)
MITIGATION MONITORING AND ENFORCEMENT SUMMARY**

Mitigation Measures	Timeframe for Implementation	Party Responsible for Implementation	Party Responsible for Monitoring and Enforcement
<p>Hydrology, Flooding and Water Quality (continued)</p> <p>Mitigation Measure 10.1a: Stormwater Pollution Prevention Plan: Combined Storm Sewer System (continued)</p> <ul style="list-style-type: none"> • Waste management BMPs shall be implemented for material delivery, use, and storage; stockpile management; spill prevention and control; solid and liquid waste management; hazardous waste management; contaminated soil management; concrete waste management; and septic/sanitary waste management; • SWPPP training requirements—Construction personnel will receive training on the SWPPP and BMP implementation; and • Site inspections and BMP maintenance—An inspector identified in the SWPPP will inspect the Project Site regularly, before and after a storm and once each 24-hour period during extended storms to identify BMP effectiveness and implement corrective actions if required. The SWPPP shall include checklists that document when the inspections occurred, the results of the inspection, required corrective measures, and when corrective measures were implemented. Required BMP maintenance related to a storm shall be completed within 48 hours of the storm. 	<p>Prior to and during construction in any area draining to separate storm sewer system</p>	<p>Project Applicant</p>	<p>City and County of San Francisco, MOH; SFRWQCB</p>
<p>Mitigation Measure 10.1b: Stormwater Pollution Prevention Plan: Separate Storm Sewer System</p> <p>Consistent with the requirements of the SWRCB General Permit for Stormwater Discharges Associated with Construction and Land Disturbing Activities (Construction General Permit), the project sponsor shall undertake the proposed project in accordance with a project-specific SWPPP prepared by a qualified SWPPP developer. The San Francisco Bay Regional Water Quality Control Board (SFRWQCB), the primary agency responsible for protecting water quality in the project area, is responsible for reviewing and ensuring compliance with the SWPPP. This review is based on the construction general permit issued by the SWRCB.</p> <p>The SWPPP shall include, as applicable, all BMPs required in Attachment C of the construction general permit for risk level 1 dischargers, Attachment D for risk level 2 dischargers, or Attachment E for risk level 3 dischargers. In addition, recommended BMPs, subject to review and approval by the SFRWQCB, include the measures listed below. However, the measures themselves may be altered, supplemented, or deleted during the SFRWQCB's review process, since it has final authority over the terms of the SWPPP.</p> <ul style="list-style-type: none"> • Scheduling <ul style="list-style-type: none"> o To reduce the potential for erosion and sediment discharge, schedule construction to minimize ground disturbance during the rainy season; schedule major grading operations during the dry season when practical, and allow enough time before rainfall begins to stabilize the soil with vegetation or to install sediment-trapping devices; o Stabilize all disturbed soils as soon as possible following ground-disturbing work; and o Sequence construction activities to minimize the amount of time that soils remain disturbed; 			

**TABLE 1 (continued)
MITIGATION MONITORING AND ENFORCEMENT SUMMARY**

Mitigation Measures	Timeframe for Implementation	Party Responsible for Implementation	Party Responsible for Monitoring and Enforcement
Hydrology, Flooding and Water Quality (continued)			
Mitigation Measure 10.1b: Stormwater Pollution Prevention Plan: Separate Storm Sewer System (continued)			
<ul style="list-style-type: none"> • Install erosion and sediment control BMPs before the start of any ground-disturbing activities; • Erosion and sedimentation <ul style="list-style-type: none"> ○ Preserve vegetation in areas where no construction is planned or where construction will occur at a later date; ○ Stabilize and revegetate disturbed areas as soon as possible after construction with planting, seeding, or mulch (e.g., straw or hay, erosion control blankets, hydromulch, or other similar material), except in cultivated areas; ○ Install silt fences, coir rolls, and other suitable measures around the perimeter of the areas affected by construction and staging areas and around riparian buffers, storm drains, temporary stockpiles, spoil areas, stream channels, swales, downslope of all exposed soil areas, and in other locations determined necessary to prevent off-site sedimentation; ○ Install temporary slope breakers during the rainy season on slopes greater than 5 percent where the base of the slope is less than 50 feet from a water body, wetland, or road crossing at spacing intervals required by the SFRWQCB; ○ Use filter fabric or other appropriate measures to prevent sediment from entering storm drain inlets; ○ Detain and treat stormwater using sedimentation basins, sediment traps, Baker tanks, or other measures to ensure that discharges to receiving waters meet applicable water quality objectives; ○ Install check dams, where applicable, to reduce flow velocities and erosion and to allow sediment to settle out of runoff; ○ Install outlet protection/energy dissipation, where applicable, to prevent scour of the soil caused by concentrated high velocity flows; and ○ Implement control measures such as spraying water or other dust palliatives to alleviate dust nuisance. • Groundwater/dewatering <ul style="list-style-type: none"> ○ Prepare a dewatering plan before excavation, specifying methods of water collection, transport, treatment, and discharge of all water produced by construction site dewatering; ○ Impound water produced by dewatering in sediment retention basins or other holding facilities to settle the solids and provide other treatment as necessary before discharge to receiving waters; locate sedimentation basins and other retention and treatment facilities away from waterways to prevent sediment-laden water from reaching streams; ○ Control discharges of water produced by dewatering to prevent erosion; and 			

**TABLE 1 (continued)
MITIGATION MONITORING AND ENFORCEMENT SUMMARY**

Mitigation Measures	Timeframe for Implementation	Party Responsible for Implementation	Party Responsible for Monitoring and Enforcement
Hydrology, Flooding and Water Quality (continued)			
Mitigation Measure 10.1b: Stormwater Pollution Prevention Plan: Separate Storm Sewer System (continued)			
<ul style="list-style-type: none"> o If contaminated groundwater is encountered, contact the SFRWQCB for appropriate disposal options; depending on the constituents of concern, such discharges may be disallowed altogether, or require regulation under a separate general or individual permit that would impose appropriate treatment requirements before discharge to the stormwater drainage system. 			
<ul style="list-style-type: none"> • Tracking controls 			
<ul style="list-style-type: none"> o Grade and stabilize construction site entrances and exits to prevent runoff from the Project Site and to prevent erosion; 			
<ul style="list-style-type: none"> o Install a washing facility at the Project Site access to allow for tire washing when vehicles exit the Project Site; and 			
<ul style="list-style-type: none"> o Remove any soil or sediment tracked off paved roads during construction by street sweeping. 			
<ul style="list-style-type: none"> • Nonstormwater controls 			
<ul style="list-style-type: none"> o Place drip pans under construction vehicles and all parked equipment; 			
<ul style="list-style-type: none"> o Check construction equipment for leaks regularly; 			
<ul style="list-style-type: none"> o Wash construction equipment in a designated enclosed area regularly; 			
<ul style="list-style-type: none"> o Contain vehicle and equipment wash water for percolation or evaporation away from storm drain inlets; 			
<ul style="list-style-type: none"> o Refuel vehicles and equipment away from receiving waters and storm drain inlets, contain the area to prevent run-on and runoff, and promptly clean up spills; and 			
<ul style="list-style-type: none"> o Cover all storm drain inlets when paving or applying seals or similar materials to prevent the discharge of these materials. 			
<ul style="list-style-type: none"> • Waste management and hazardous materials pollution control 			
<ul style="list-style-type: none"> o Remove trash and construction debris from the project area daily; 			
<ul style="list-style-type: none"> o Locate sanitary facilities a minimum of 300 feet from receiving waters, and maintain sanitary facilities regularly; 			
<ul style="list-style-type: none"> o Store all hazardous materials in an area protected from rainfall and stormwater run-on and prevent the off-site discharge of hazardous materials; 			
<ul style="list-style-type: none"> o Minimize the potential for contamination of receiving waters by maintaining spill containment and cleanup equipment on-site and by properly labeling and disposing of hazardous wastes; 			
<ul style="list-style-type: none"> o Locate waste collection areas close to construction entrances and away from roadways, storm drains, and receiving waters; 			

**TABLE 1 (continued)
MITIGATION MONITORING AND ENFORCEMENT SUMMARY**

Mitigation Measures	Timeframe for Implementation	Party Responsible for Implementation	Party Responsible for Monitoring and Enforcement
Hydrology, Flooding and Water Quality (continued)			
Mitigation Measure 10.1b: Stormwater Pollution Prevention Plan: Separate Storm Sewer System (continued)			
<ul style="list-style-type: none"> o Inspect trash receptacles and other waste and debris containers regularly for leaks and remove and properly dispose of any hazardous materials and liquid wastes placed in these containers; train construction personnel in proper material delivery, handling, storage, cleanup, and disposal; and o Implement construction materials management BMPs for road paving, surfacing, and asphalt removal activities and for handling and disposing of concrete and cement. • BMP inspection, maintenance, and repair <ul style="list-style-type: none"> o Inspect all BMPs regularly to confirm proper installation and function and inspect BMPs daily during storms; and o Immediately repair or replace BMPs that have failed; provide sufficient devices and materials (e.g., silt fence, coir rolls, erosion blankets) throughout the project construction to enable immediate corrective action for failed BMPs. • Monitoring and reporting <ul style="list-style-type: none"> o Provide the required documentation for SWPPP inspections, maintenance, and repair requirements; identify in the SWPPP the personnel who will perform monitoring and inspection; o Maintain written records of inspections, spills, BMP-related maintenance, corrective actions, and observations of off-site discharges of sediment or other pollutants, as required by the SFRWQCB; and o Monitor the water quality of discharges from the Project Site to assess the effectiveness of control measures. • Implement BMPs for shoreline improvements and work over water to minimize the potential transport of sediment, debris, and construction materials to the Lower Bay during construction of shoreline improvements. • Post-construction BMPs <ul style="list-style-type: none"> o Revegetate all temporarily disturbed areas as required after construction activities are completed; o Remove any remaining construction debris and trash from the Project Site and area on project completion; o Phase the removal of temporary BMPs as necessary to ensure stabilization of the Project Site; o Maintain post-construction site conditions to avoid formation of unintended drainage channels, erosion, or areas of sedimentation; and o Correct post-construction site conditions as necessary to comply with the SWPPP and any other pertinent SFRWQCB requirements. 			
Train construction site personnel on components of the SWPPP and BMP implementation. Train personnel who will perform inspection and monitoring activities.			

**TABLE 1 (continued)
MITIGATION MONITORING AND ENFORCEMENT SUMMARY**

Mitigation Measures	Timeframe for Implementation	Party Responsible for Implementation	Party Responsible for Monitoring and Enforcement
Hydrology, Flooding and Water Quality (continued)			
Mitigation Measure 10.1c: Regulatory Stormwater Requirements			
<p>In accordance with the San Francisco Stormwater Design Guidelines, the project sponsor shall submit a stormwater control plan to the SFPUC, as part of the development application submitted for approval. The plan shall demonstrate how the following measures would be incorporated into the project:</p> <ul style="list-style-type: none"> • Low impact development site design principles (e.g., preserving natural drainage channels and treating stormwater runoff at its source rather than in downstream centralized controls); • Source control BMPs in the form of design standards and structural features for the following areas, as applicable: <ul style="list-style-type: none"> o Commercial areas; o Restaurants; o Retail gasoline outlets; o Automotive repair shops; and o Parking lots; • Source control BMPs for landscaped areas shall be documented in a landscape management plan that relies on integrated pest management and includes pesticide and fertilizer application guidelines; and • Treatment control measures (e.g., bioretention, porous pavement, vegetated swales) targeting the project specific contaminants of concern: sediment, pathogens, metals, nutrients (nitrogen and phosphorus compounds), oxygen demanding substances, organic compounds (e.g., PCBs and pesticides), oil and grease, and trash and debris. The stormwater control plan shall demonstrate that the project has the land area available to support the proposed BMP facilities sized in accordance with the required water quality design storm. Volume-based BMPs shall be sized to treat runoff resulting from a rainfall intensity of 0.75 inch of rainfall (LEED SS6.2), and flow-based BMPs shall be sized to treat runoff resulting from a rainfall intensity of 0.2 inch per hour. Treatment trains¹⁰ shall be used where feasible. <p>Additional requirements:</p> <ul style="list-style-type: none"> • LEED SS6.2—BMPs used to treat runoff shall be designed to remove 80 percent of the average annual post-development total suspended solids loads. BMPs are considered to meet these criteria if they are designed in accordance with SFPUC requirements. • The SCP shall include an operations and maintenance plan that demonstrates how the treatment control BMPs would be maintained in the long term, what entities would be responsible for BMP maintenance in the public and private rights-of-way, funding mechanisms, and what mechanisms would be used to formalize maintenance and access agreements. 	<p>Prior to development application approval</p>	<p>Project Applicant</p>	<p>City and County of San Francisco, MOH; SFPUC</p>

¹⁰ The sequencing of structural BMPs to achieve optimal flow management and pollutant removal from urban stormwater.

**TABLE 1 (continued)
MITIGATION MONITORING AND ENFORCEMENT SUMMARY**

Mitigation Measures	Timeframe for Implementation	Party Responsible for Implementation	Party Responsible for Monitoring and Enforcement
Hydrology, Flooding and Water Quality (continued)			
Mitigation Measure 10.1c: Regulatory Stormwater Requirements (continued)			
<p>The project sponsor shall also prepare a stormwater drainage master plan for approval by the SFPUC. It shall include plans for the storm drain infrastructure and for stormwater management controls (e.g., vegetated swales, dry wells). The storm drain infrastructure shall illustrate conveyance of the five-year storm in a separate storm drain piped system and conveyance of the 100-year storm in the street and drainage channel rights-of-way.</p>			
Mitigation Measure 10.1d: Groundwater Dewatering Plan			
<p>Prior to commencement of construction activities and to minimize potential impacts to receiving water quality during the construction period, the Project Applicant shall through the proper implementation of this dewatering plan, show compliance with SFRWQCB/NPDES requirements, whichever are applicable.</p>			
<p>The Dewatering Plan shall specify how the water would be collected, contained, treated, monitored, and/or discharged to the vicinity drainage system or Lower Bay. Subject to the review and approval of the SFRWQCB, the Dewatering Plan shall include, at a minimum:</p>			
<ul style="list-style-type: none"> • Identification of methods for collecting and handling water on site for treatment prior to discharge, including locations and capacity of settling basins, infiltration basins (where not restricted by site conditions), treatment ponds, and/or holding tanks. • Identification of methods for treating water on site prior to discharge, such as filtration, coagulation, sedimentation settlement areas, oil skimmers, pH adjustment, and other BMPs. • Procedures and methods for maintaining and monitoring dewatering operations to ensure that no breach in the process occurs that could result in an exceedance of applicable water quality objectives. • Identification of discharge locations and inclusion of details on how the discharge would be conducted to minimize erosion and scour. • Identification of maximum discharge rates to prevent exceedance of storm drain system capacities. • Additional requirements of the applicable General Permit or NPDES Permit/WDR (including effluent and discharge limitations and reporting and monitoring requirements, as applicable) shall be incorporated into the Dewatering Plan. <p>Any exceedance of established narrative or numeric water quality objectives shall be reported to the SFRWQCB and corrective action taken as required by the SFRWQCB and the Dewatering Plan. Corrective action may include increased residence time in treatment features (e.g., longer holding time in settling basins) and/or incorporation of additional treatment measures (e.g., addition of sand filtration prior to discharge).</p>			
<p>Prior to and during construction in any area draining to separate sewer system</p>	Project Applicant	City and County of San Francisco, MOH; SFRWQCB	

**TABLE 1 (continued)
MITIGATION MONITORING AND ENFORCEMENT SUMMARY**

Mitigation Measures	Timeframe for Implementation	Party Responsible for Implementation	Party Responsible for Monitoring and Enforcement
Geology and Soils			
Mitigation Measure 12.1a: Site-Specific Geotechnical Investigation with Seismic Analyses			
Prior to the issuance of any building permits for the Project Site:	Prior to issuance of building permits	Project Applicant	City and County of San Francisco, MOH; San Francisco DBI
<ul style="list-style-type: none"> The Applicant shall submit to the San Francisco DBI for review and approval a site-specific, design-level geotechnical investigation prepared by a California Certified Engineering Geologist (CEG) or California Registered Geotechnical Engineer (GE), as well as project plans prepared in compliance with the requirements of the SFBC, the Seismic Hazards Mapping Act, and requirements contained in California Geological Survey Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California. In addition, all engineering practices and analyses of peak ground accelerations and structural design shall be consistent with SFBC standards to ensure that structures can withstand expected ground accelerations. The CEG or GE shall determine and DBI shall approve design requirements for foundations and all other improvements associated with the permit application. 			
<ul style="list-style-type: none"> DBI shall employ a third-party CEG and California Registered Professional Engineer (Civil) (PE) to form a geotechnical peer review committee (GPRC), consisting of DBI and these third-party reviewers. The committee shall review the site-specific geotechnical investigations and the site-specific structural, foundation, infrastructure, and other relevant plans to ensure that the plans incorporate all necessary geotechnical mitigation measures. DBI shall issue no permits until the committee has approved the geotechnical investigation and the project plans, including the factual determinations and the proposed engineering designs and construction methods. 			
<ul style="list-style-type: none"> All project structural designs shall incorporate and conform to the requirements in the site-specific geotechnical investigations; and 			
<ul style="list-style-type: none"> The project CEG or GE shall be responsible for ensuring compliance with these requirements. 			
Mitigation Measure 12.1b: Seismic Design Compliance Documentation			
Prior to the issuance of a building permit for the replacement of the Alice Griffith Public Housing site, the Applicant shall submit any and all seismic design compliance documentation to the U.S. Department of Housing and Urban Development (HUD), as required by that agency. The Project Developer shall confirm, by copy of all documents submitted, including transmittal, compliance with this requirement to DBI. The project CEG or GE shall be responsible for verifying project compliance with this requirement.	Prior to issuance of building permits	Project Applicant	City and County of San Francisco, MOH; HUD; San Francisco DBI
Mitigation Measure 12.2a: Site-Specific Geotechnical Investigation with Analyses of Liquefaction, Lateral Spreading and/or Settlement			
Prior to issuance of building permits for the Project Site:	Prior to issuance of building permits	Project Applicant/Project Geologist	City and County of San Francisco, MOH; San Francisco DBI; GPRC
<ul style="list-style-type: none"> The Applicant shall submit to the DBI for review and approval a site-specific, design-level geotechnical investigation prepared by a CEG or GE, as well as project plans prepared in compliance with the 			

**TABLE 1 (continued)
MITIGATION MONITORING AND ENFORCEMENT SUMMARY**

Mitigation Measures	Timeframe for Implementation	Party Responsible for Implementation	Party Responsible for Monitoring and Enforcement
Geology and Soils (continued)			
Mitigation Measure 12.2a: Site-Specific Geotechnical Investigation with Analyses of Liquefaction, Lateral Spreading and/or Settlement (continued)			
<p>requirements of the SFBC, the Seismic Hazards Mapping Act, and requirements contained in CGS Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California. In addition, all engineering practices, and analyses of structural design shall be consistent with SFBC standards to ensure seismic stability, including reduction of potential liquefaction hazards.</p>			
<ul style="list-style-type: none"> • DBI shall employ a third-party CEG and California Registered Professional Engineer (Civil) to form a GPRC, consisting of DBI and these third-party reviewers. The GPRC shall review the site-specific geotechnical investigations and the site-specific structural, foundation, infrastructure, and other relevant plans to ensure that these plans incorporate all necessary geotechnical mitigation measures. No permits shall be issued by the DBI until the GPRC has approved the geotechnical investigation and the project plans, including the factual determinations and the proposed engineering designs and construction methods. 			
<ul style="list-style-type: none"> • All project structural designs shall incorporate and conform to the requirements in the site-specific geotechnical investigations. 			
<ul style="list-style-type: none"> • The site-specific project plans shall incorporate the mitigation measures contained in the approved site-specific geotechnical reports to reduce liquefaction hazards. The engineering design techniques to reduce liquefaction hazards shall include proven methods generally accepted by CEGs, subject to DBI and GPRC review and approval, including the following: 			
Structural Measures			
<ul style="list-style-type: none"> • Construction of deep foundations, which transfer loads to competent strata beneath the zone susceptible to liquefaction, for critical utilities and shallow foundations; and 			
<ul style="list-style-type: none"> • Structural mat foundations to distribute concentrated load to prevent damage to structures. 			
Ground Improvement Measures			
<ul style="list-style-type: none"> • Additional over-excavation and replacement of unstable soil with engineering-compacted fill; 			
<ul style="list-style-type: none"> • Dynamic compaction, such as deep dynamic compaction or rapid impact compaction, to densify loose soils below the groundwater table; 			
<ul style="list-style-type: none"> • Vibro-compaction, sometimes referred to as vibro-flotation, to densify loose soils below the groundwater table; 			
<ul style="list-style-type: none"> • Stone columns to provide pore pressure dissipation pathways for soil, to compact loose soil between columns, and to provide additional bearing support beneath foundations; 			
<ul style="list-style-type: none"> • Soil-cement columns to densify loose soils and provide additional bearing support beneath foundations. 			
<p>The project CEG or GE shall be responsible for ensuring compliance with these requirements.</p>			

**TABLE 1 (continued)
MITIGATION MONITORING AND ENFORCEMENT SUMMARY**

Mitigation Measures	Timeframe for Implementation	Party Responsible for Implementation	Party Responsible for Monitoring and Enforcement
Geology and Soils (continued)			
Mitigation Measure 12.2b: Site-Specific Geotechnical Investigation with Expansive Soils Analyses	Prior to issuance of building permits	Project Applicant	City and County of San Francisco, MOH; San Francisco DBI; GPRC
Prior to issuance of building permits for the Project Site:			
<ul style="list-style-type: none"> The Applicant shall submit for DBI review and approval a site-specific, design-level geotechnical investigation prepared by a CEG or GE, as well as project plans prepared in compliance with the requirements of the SFBC. In addition, all engineering practices and analyses of structural design shall be consistent with SFBC standards to ensure soils stability, including reduction of potential soil expansion hazards. 			
<ul style="list-style-type: none"> DBI shall employ a third-party CEG and California Registered PE to form a GPRC, consisting of DBI and these third-party reviewers. The GPRC shall review the site-specific geotechnical investigations and the site-specific structural, foundation, infrastructure, and other relevant plans to ensure that these plans incorporate all necessary geotechnical mitigation measures. DBI shall issue no permits until the GPRC has approved the geotechnical investigation and the project plans, including the factual determinations and the proposed engineering designs and construction methods. 			
<ul style="list-style-type: none"> All project structural designs shall incorporate and conform to the requirements in the site-specific geotechnical investigations. 			
<ul style="list-style-type: none"> The site-specific project plans shall incorporate the mitigation measures contained in the approved site-specific geotechnical reports to reduce expansive soils hazards. The engineering design techniques to reduce expansive soils hazards shall include proven methods generally accepted by GEs and CEGs, subject to DBI and GPRC review and approval. The design-level geologic and geotechnical studies shall identify the presence of expansive soils and potentially unstable soils and shall identify means to avoid the hazard of or support the design of engineering procedures to stabilize the soils, as required by Chapter 18 (Soils and Foundations) of the SFBC. Sections 1803 through 1812 of the SFBC contain the formulas, tables, and graphs by which the project engineer shall develop the project's soil-stability specifications, including the appropriate foundation designs for structures on expansive soils and which the DBI would use to verify the applicability of the specifications. If expansive soils are identified, appropriate support and protection procedures shall be designed and implemented to maintain the stability of soils next to newly graded or re-graded access roads, work areas, and structures during and after construction and to minimize potential for damage to structures and facilities at the Project Site. 			
The project CEG or GE shall be responsible for ensuring compliance with these requirements.			
Mitigation Measure 12.2c: Site-Specific Geotechnical Investigation with Corrosive Soils Analyses	Prior to issuance of building permits	Project Applicant	City and County of San Francisco, MOH; San Francisco DBI; GPRC
Before building permits are issued for the Project Site:			
<ul style="list-style-type: none"> The project sponsor shall submit for DBI review and approval a site-specific, design-level geotechnical investigation prepared by a CEG or GE, as well as project plans prepared in compliance with the requirements of the SFBC. In addition, all engineering practices and analyses of structural design shall 			

**TABLE 1 (continued)
MITIGATION MONITORING AND ENFORCEMENT SUMMARY**

Mitigation Measures	Timeframe for Implementation	Party Responsible for Implementation	Party Responsible for Monitoring and Enforcement
Geology and Soils (continued)			
<p>Mitigation Measure 12.2c: Site-Specific Geotechnical Investigation with Corrosive Soils Analyses (continued)</p> <p>be consistent with SFBC standards to ensure soils stability, including reduction of potential hazards from corrosive soils.</p> <ul style="list-style-type: none"> • DBI shall employ a third-party CEG and California Registered PE to form a GPRC, consisting of DBI and these third-party reviewers. The GPRC shall review the site-specific geotechnical investigations and the site-specific structural, foundation, infrastructure, and other relevant plans to ensure that these plans incorporate all necessary geotechnical mitigation measures. DBI shall issue no permits shall until the GPRC has approved the geotechnical investigation and the project plans, including the factual determinations and the proposed engineering designs and construction methods. • All project structural designs shall incorporate and conform to the requirements in the site-specific geotechnical investigations. • The site-specific project plans shall incorporate the mitigation measures contained in the approved site-specific geotechnical reports to reduce potential hazards from corrosive soils. The engineering design techniques to reduce corrosive soils hazards shall include proven methods generally accepted by GEs and CEGs, subject to DBI and GPRC review and approval. The design-level geologic and geotechnical studies shall identify the presence of corrosive soils and shall identify means to avoid the hazard, as required by Chapter 18 (Soils and Foundations) of the SFBC. Sections 1803 through 1812 of the SFBC contain the formulas, tables, and graphs by which the project engineer shall develop the project's structural design specifications, including the appropriate foundation designs for structures on corrosive soils and which DBI would use to verify the applicability of the specifications. If corrosive soils are identified, appropriate protection procedures shall be designed and implemented to minimize potential for damage from corrosive soils to structures and facilities at the Project Site. <p>The project CEG or GE shall be responsible for ensuring compliance with these requirements.</p>	<p>Prior to issuance of any permit for construction activity involving controlled rock fragmentation, and during construction</p>	<p>Project Applicant</p>	<p>City and County of San Francisco, MOH; San Francisco DBI</p>
<p>Mitigation Measure 12.3: Minimize Rock Fragmentation Impacts during Construction</p> <p>Prior to the issuance of any permit is issued for a construction activity that would involve controlled rock fragmentation that could cause settlement or lateral movement of structures on nearby properties, the Applicant shall, in compliance with Section 1803.1 of the San Francisco Building Code (SFBC), include in the permit application methods and techniques to ensure that controlled rock fragmentation would not cause unacceptable vibration or settlement or lateral movement of structures at nearby properties. Methods and technologies shall be based on the specific conditions at the construction site such as, but not limited to, the following:</p> <ul style="list-style-type: none"> • Pre-excavation, surveying of potentially affected structures; • Installation of a cut off trench between the vibration zone and existing structures, as applicable; • Underpinning foundations of potentially affected structures, as necessary; and 			

**TABLE 1 (continued)
MITIGATION MONITORING AND ENFORCEMENT SUMMARY**

Mitigation Measures	Timeframe for Implementation	Party Responsible for Implementation	Party Responsible for Monitoring and Enforcement
<p>Geology and Soils (continued)</p> <p>Mitigation Measure 12.3: Minimize Rock Fragmentation Impacts during Construction (continued)</p> <ul style="list-style-type: none"> Implementation of a monitoring program to detect ground settlement or lateral movement of structures in the vicinity of an excavation. Monitoring results shall be submitted to DBI. In the event of unacceptable ground movement, as determined by DBI inspections, all excavation shall cease and corrective measures shall be implemented. DBI shall reevaluate and approve the controlled rock fragmentation program and ground stabilization measures. 			
<p>Biological Resources</p> <p>Mitigation Measure 14.1: Impact Avoidance and Pre-Construction Surveys for Nesting Special-Status and Legally Protected Avian Species</p> <p>The project sponsor shall implement the following measures to avoid impacts on nesting birds:</p> <ul style="list-style-type: none"> Not more than 15 days before construction between February 1 and August 31, surveys for nesting birds shall be conducted by a qualified biologist (one familiar with the breeding biology and nesting habits of birds that may breed in the project vicinity) that is selected by the project sponsor and approved by the Successor Agency. Surveys shall cover the entire area to be affected by construction and the area within a 250-foot buffer of construction or ground-disturbing activities. The results of the surveys, including survey dates, times, methods, species observed, and a map of any discovered nests, shall be submitted to the City or Successor Agency. If no active avian nests (i.e., those with eggs or young) are identified on or within 250 feet of the limits of the disturbance area, no further mitigation is necessary. Phased construction work shall require additional surveys if vegetation or building removal has not occurred within 15 days of the initial survey or is planned for an area that was not previously surveyed. Alternatively, to avoid impacts, the project sponsor shall begin construction after the previous breeding season for local raptors and other special-status species has ended (after August 31) and before the next breeding season begins (before February 1). If active nests (with eggs or young) of special-status or protected avian species are found within 250 feet of the proposed disturbance area, a minimum 250-foot no-disturbance buffer zone surrounding active raptor nests and a minimum 100-foot buffer zone surrounding nests of other special-status or protected avian species shall be established until the young have fledged. Project activities shall not occur in the buffer as long as the nest is active. The size of the buffer area may be reduced if a qualified biologist familiar with the species' nesting biology (as approved by the City or Successor Agency) and the CDFG determine it would not be likely to have adverse effects on the particular species. Alternatively, certain activities may occur in the aforementioned buffers, with CDFG concurrence, if a qualified biologist monitors the activity of nesting birds for signs of agitation while those activities are being performed. If the birds show signs of agitation, suggesting that they could abandon the nest, activities would cease in the buffer area. No action other than avoidance shall be taken without CDFG consultation. 	<p>Not more than 15 days before construction between February 1 and August 31</p>	<p>Project Applicant</p>	<p>City and County of San Francisco, MOH; CDFG if applicable</p>

**TABLE 1 (continued)
MITIGATION MONITORING AND ENFORCEMENT SUMMARY**

Mitigation Measures	Timeframe for implementation	Party Responsible for Implementation	Party Responsible for Monitoring and Enforcement
Biological Resources (continued)			
Mitigation Measure 14.1: Impact Avoidance and Pre-Construction Surveys for Nesting Special-Status and Legally Protected Avian Species (continued)			
<ul style="list-style-type: none"> Completion of the nesting cycle (to determine when construction near the nest can commence) shall be determined by a qualified biologist experienced in identification and biology of the specific special-status or protected species. 	Prior to issuance of a demolition or building permit, during construction	Project Applicant	City and County of San Francisco, MOH; San Francisco DBI; San Francisco DPW
Mitigation Measure 14.3: Preservation and Replacement of Significant Trees and Preservation and Planting of Street Trees			
Construction outside of the DPW jurisdiction could result in the disturbance or removal of a large number of trees. To minimize this impact, the project sponsor shall implement following measures in these areas:			
<ul style="list-style-type: none"> To the extent feasible, avoid the removal of trees that meet the size specifications of significant trees in the Public Works Code Article 16. Any such trees that are removed shall be replaced at a minimum of 1 to 1 (one tree impacted to one tree replaced). The species used for replacement shall be consistent with DPW recommendations. 			
<ul style="list-style-type: none"> Plant street trees in all new development areas. The species, size, and locations shall be consistent with the requirements specified in Planning Code Section 14.3, including the following: <ul style="list-style-type: none"> The street tree installed shall be a minimum of one 24-inch box tree for each 20 feet of frontage of the property along each street or alley, with any remaining fraction of 10 feet or more of frontage requiring an additional tree. Such trees shall be either within a setback area on the lot or within the public right-of-way along such lot. The species of trees selected shall be suitable for the site, and, in the case of trees installed in the public right-of-way, the species and locations shall be subject to DPW approval. Procedures and other requirements for the installation, maintenance, and protection of trees in the public right-of-way shall be as set forth in Public Works Code Article 16. 			
<ul style="list-style-type: none"> If a significant tree or street tree would not be removed, but construction activities would occur within the dripline of such tree, a tree protection plan shall be prepared by an arborist certified by the International Society of Arboriculture, in accordance with the Urban Forestry Ordinance. This plan shall be submitted to the Planning Department for review and approval before a demolition or building permit is issued. The tree protection plan shall include measures to protect all parts of a tree from disturbance during construction and may include the following: <ul style="list-style-type: none"> A site plan with tree species, trunk location, trunk diameter at breast height, and the canopy dripline area within development; The use of protective fencing to establish an area to be left undisturbed during construction; Protection specifications, including construction specifications such as boring instead of trenching for utility lines, or tree specifications such as drainage, fertilization, or irrigation measures; and Pruning specifications, if needed, to preserve the health of the tree and allow construction to proceed. 			